IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of	Group Art Unit: 2163
Scott D. Smyers *et al.*	Examiner: Filipczyk, Marcin R.
Serial No. 09/608,617	**REPLY BRIEF IN RESPONSE TO EXAMINER'S ANSWER**
Filed: June 30, 2000	
For: **METHOD OF AND APPARATUS FOR WRITING AND READING TIME SENSITIVE DATA WITHIN A STORAGE DEVICE**	162 N. Wolfe Rd. Sunnyvale, CA 94086 (408) 530-9700
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Mail Stop Appeal Brief - Patents
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Sir:

In reply to the Examiner's Answer mailed on November 1, 2007, this Reply Brief is hereby submitted. Claims 1-15, 19-35 and 44-54 have been rejected. The appellant submits this brief to the Board of Patent Appeals and Interferences in compliance with the requirements of 37 C.F.R. § 41.41, as stated in *Rules of Practice Before the Board of Patent Appeals and Interferences (Final Rule)*, 69 Fed. Reg. 49959 (August 12, 2004).

The appellant contends that the rejection of Claims 1-15, 19-35 and 44-54 in this pending application is in error and should be overcome by this appeal. The appellant further contends that the Webb reference, used as a basis of the rejections of the pending claims, has been mischaracterized, misinterpreted and misapplied in order to attempt to support the rejection of Claims 1-15, 19-35 and 44-54.

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I. SUMMARY OF THE CLAIMED INVENTION

The apparatus and method of the present invention receives a received packet of data to be written to a media storage device, adds a meta data header to the *received packet* of data at the media storage device thereby forming an extended packet of data, and stores the extended packet of data onto a media within the media storage device. The extended packet of data includes the packet header *and* the meta data header.

An incoming stream of data which is to be recorded on storage media within the media storage device is mapped in order that significant points within the stream of data can be efficiently found during the playback of the stream of data. When a stream of data is recorded on the storage media within the media storage device of the present invention, a meta-data header is added by the media storage device to each incoming packet within the stream of data. Preferably, the media storage device includes an embedded stream processor which is responsible for appropriately adding this meta-data header to the stream of data. The stream of data can include data on one or more channels. The meta-data header is preferably added to the beginning of each packet within the stream, if packets are received on a single isochronous channel, and to the beginning of each group of packets within an isochronous cycle, if packets are received on multiple isochronous channels. The meta-data header includes a cycle mark value and a cycle count value. The cycle mark value marks isochronous cycle boundaries within the recorded data stream. The cycle count value specifies the value of the isochronous cycle number on which the packet or group of packets was received.

In one embodiment of the present invention, referring to Figs. 4A and 4B, a series of source packets 60-63 is generated at a source device 50. The source device 50 then applies source packet headers 68-71 to each of the source packets 60-63, respectively. The source device 50 then splits the combination source packets and source packet headers into data blocks, with each source packet being split into multiple data blocks. Some number of the data blocks are then combined into an isochronous packet and the isochronous header and the common isochronous packet (CIP) header are then applied to the isochronous packet by the source device 50. Once the isochronous and CIP headers are applied to the isochronous data packet, the packet is then transmitted by the source device 50 over the IEEE 1394-1995 serial bus to the media storage device 40 of the present invention. When the packet is *received* by the media storage device 40, *a meta-data header is added* by the media storage device 40 to the *received packet*.

When transmitting data which has been previously stored on storage media within the media storage device, the meta-data headers stored within the stream of data are used to locate specific locations within the stream of data during retrieving operations. The meta-data header stored with each packet or group of packets within the stream of data is also utilized if an error occurs during the transmission of a stream of data to resynchronize the stream of data and continue the transmission of the stream of data. During transmission, the stream of data is read from the storage media, processed by the media storage device and transmitted from the media storage device according to appropriate protocol conventions. The processing performed by the media storage device during transmission includes stripping the meta-data header from the packets and reformatting the packets, as appropriate, for transmission on the appropriate channel over the IEEE 1394-1995 serial bus. This processing is preferably performed by the embedded stream processor within the media storage device.

II. CLAIMS 19-23 AND 53 ARE DIRECTED TO STATUTORY SUBJECT MATTER

The computer readable medium of Claims 19-23 and 53 is statutory subject matter. The Examiner has cited State Street Bank & Trust Co. v. Signature Financial Group, Inc., 149 F.3d 1368 (Fed.Cir. 1998) for the proposition that the present invention recited in Claims 19-23 and 53 is directed to non-statutory subject matter because the claimed invention does not produce a "useful, concrete and tangible result." (Id. at 1373). The appellant respectfully disagrees.

A primary purpose of the present invention is the recording and playback of time sensitive data such as audio and video transmitted to and from a media storage device via an inexpensive high speed bus such as defined by IEEE Std 1394-1995 "1394 Standard for A High Performance Serial Bus" (Specification at page 5, lines 8-16). The claimed invention is not limited to the IEEE 1394 bus standard, isochronous data transfers, and audio and visual data streams. The following discussion is so limited for simplicity to exemplify a specific useful, concrete and tangible result obtained by the invention recited in Claims 19-23 and 53.

Transmission of time sensitive data on a serial bus compliant with the IEEE 1394 standard is based on a universal clock called a cycle timer which is used to synchronize isochronous data transfers on all nodes connected to the bus. [Present Specification, page 1, lines 18-20]. A media storage device receives isochronous data packets from a source device on an IEEE 1394 serial bus, an embedded processor adds a meta data header containing a cycle timer value (the cycle count) and a cycle mark value to locate cycle boundaries within the received packets to the received isochronous packets, and stores them on a storage media. [Present Specification, page 5, line 25 through page 6, line 7]. The computer readable medium

claimed in Claims 19 and 53 is such a storage media upon which data has been stored according to the above method.

Storing the cycle count and cycle mark in a meta data header with the received isochronous data packets enables real-time playback of the stored isochronous data packets by associating isochronous data packets for playback with the cycle count and cycle mark needed to synchronize the packets to the IEEE 1394 serial bus during playback. [Present Specification, page 6, line 25 through page 7 line 10]. In addition to playback, storing the cycle count and cycle mark in a meta data header with the isochronous data packets facilitates such practical playback features as fast-forward and rewind which can be accomplished by sequencing the isochronous packet transmissions using the cycle count and cycle mark in the meta data header stored with the isochronous data packets. The meta data headers stored within the recorded stream of data are also utilized to recover from any error conditions and resynchronize the transmission of the data during playback.

The computer readable medium described in Claims 19 and 53 is a storage medium wherein a meta data header containing cycle count and cycle mark values has been added to received data packets by a media storage device as the packets are recorded on the storage media within the media storage device. As described above, such a computer readable medium used within a media storage device produces a useful, concrete and tangible result by enabling real-time playback of time-sensitive data stored on the computer readable medium through use of timing information stored in the meta data header with the isochronous data packets on the computer readable media. As also described above, the meta data header stored within the recorded stream of data are also utilized to recover from any error conditions and resynchronize the transmission of the data during play back. For at least these reasons, the independent Claims 19 and 53 which recite the computer readable medium described above produce a useful, concrete and tangible result and are allowable statutory subject matter. Claims 20-23 are also allowable as being dependent upon allowable base Claim 19. Accordingly, Claims 19-23 and 53 are all allowable.

III. SUMMARY OF TEACHINGS OF WEBB

Webb teaches a method and system for backing up digital data. Webb teaches that at each backup interval, the computer system sends all files created or modified since the time stamp to the backup system. [Webb, Abstract] Webb further teaches that the file stream flowing *from the computer system* to the backup system *contains metadata* at the boundaries of each file.

[Webb, Abstract] Webb does not teach that a *meta data header* is added to a *received packet* of data *at a media storage device*. Webb teaches that the server sends meta data for each directory and meta and file stream data for each file on the client volume. [Webb, col. 6, line 64 - col. 7, line 1] Webb also teaches that a meta file is a file that contains a meta header and a meta entry for each file or directory that exists on a client's computer system at this backup time. [Webb, col. 7, lines 1-3] Webb does not teach that a meta data header is added to a *received packet*. Webb teaches that the meta file and the data file are *stored separately* at the server. [Webb, col. 7, lines 9-14] Webb also does not teach that a meta data header is added to a *received packet* at a media storage device. As described above, Webb teaches that the file stream flowing *from the computer system* to the backup system *contains meta data* at the boundaries of each file. [Webb, Abstract] Webb also does not teaching *stripping* header data from a previously stored packet of data at a media storage device and *transmitting* the retrieved packet of data to another device.

As described above, Webb does not teach that a meta data header is added to a *received packet*. Webb teaches that the meta file and the data file are stored separately at the server. [Webb, col. 7, lines 9-14, Figure 8] Webb also does not teach that a meta data header is added to a *received packet at a media storage device*. As described above, Webb teaches that the file stream flowing *from the computer system* to the backup system *contains metadata* at the boundaries of each file. [Webb, Abstract]

Figure 13 of Webb is a flow chart illustrating the steps of a full network backup according to the teachings of Webb. [Webb, column 4, line 44]. The first step taught by Webb is a full backup of the client data files. The first step in a full backup of the client data files, step 104 labeled "Client Sends Meta Entry for the Next File or Directory", *requires* that the client transmit meta data before transmitting file data in order to execute the backup process, and at step 105 labeled "Client Sends File Data and a File Stream Footer to the Server" the process further requires that the file data be followed by a meta footer transmitted by the client. Moreover, the requirement of a meta data header preceding the file data and a meta data footer following the file data is reiterated in Figure 21A of Webb illustrating the steps to perform an incremental network merge backup. [Webb, column 5, lines 1-3]. Figure 21A, step140a labeled "Client Sends Meta Data for the Next File or Directory..." *requires* that the client send a meta data header before sending the file data. Step 150a labeled "Client Sends File Data and a File Stream Footer to the Server" reiterates that the process taught by Webb *requires* that the client send a meta data header, then the file data, followed by a meta data footer. [Webb, Figure 21A] Webb does not teach the backup server receiving a data file from the client without the client first

transmitting a meta data header preceding the data file and then transmitting a meta footer following the data file. Webb never teaches combining a meta data header with file data into the same packet which also includes a packet header. Further, Webb does not teach adding meta data to a received packet. Webb also does not teach stripping header data from a previously stored packet of data at a media storage device and transmitting the retrieved packet of data to another device. As described above, Webb teaches requiring transmittal of files from the client to the backup system with a meta data header preceding, and a meta data footer following each file, but not a meta data header added to a received packet combined with file data.

Webb also does not teach that a meta data header includes a cycle mark value which includes a pattern used to locate cycle boundaries and a cycle count value specifying a cycle number of a cycle in which the received packet of data was received.

The independent Claim 1 is directed to a method of writing data to a media storage device. The method of Claim 1 comprises receiving a received packet of data to be written to the media storage device, the received packet of data including a packet header, adding a meta data header to the *received packet* of data at the media storage device thereby forming an extended packet of data including both the packet header and the meta data header, and storing the extended packet of data onto a media within the media storage device. As described above, Webb does not teach that a meta data header is added to a *received packet*. Webb teaches that the meta file and the data file are *stored separately* at the server. [Webb, col. 7, lines 9-14] Webb also does not teach adding a meta data header to the *received packet* of data *at the media storage device*. As described above, Webb teaches that the file stream flowing *from the computer system* to the backup system *contains metadata* at the boundaries of each file. [Webb, Abstract] For at least these reasons, the independent Claim 1 is allowable over the teachings of Webb.

The dependent Claim 2 further specifies that the meta data header includes a cycle mark value which includes a pattern used to locate cycle boundaries, and a cycle count value specifying a cycle number of a cycle in which the received packet of data was received. As described above, Webb also does not teach that a meta data header includes a cycle mark value which includes a pattern used to locate cycle boundaries and a cycle count value specifying a cycle number of a cycle in which the received packet of data was received. For at least these reasons, Claim 2 is allowable over the teachings of Webb.

Claims 2-7 are all dependent on the independent Claim 1. As discussed above, the independent Claim 1 is allowable over the teachings of Webb. Accordingly, the dependent Claims 2-7 are all also allowable as being dependent on an allowable base claim.

The independent Claim 8 is directed to a method of reading data from a media storage device which has previously been stored with header data generated by the media storage device. The method of Claim 8 comprises locating a first header data, including a cycle mark value having a pattern, reading a previously stored packet of data following the first header data from a media within the media storage device, the previously stored packet of data including a packet header, *stripping* the first header data from the *previously stored packet of data* at the media storage device thereby forming a retrieved packet of data, and *transmitting* the retrieved packet of data to another device. As described above, Webb does not teach *stripping* first header data from the previously stored packet of data *at the media storage device* and *transmitting* the retrieved packet of data to another device. As also described above, Webb does not teach header data that includes a cycle mark value. For at least these reasons, the independent Claim 8 is allowable over the teachings of Webb.

The dependent Claim 10 further specifies that the pattern is used to locate cycle boundaries, and the first header data further includes a cycle count value specifying a cycle number of a cycle in which the previously stored packet of data was received. As described above, Webb also does not teach a header including a cycle count value specifying a cycle number of a cycle in which the previously stored packet of data was received. For at least these reasons, Claim 10 is allowable over the teachings of Webb.

Claims 9-15 are all dependent on the independent Claim 8. As discussed above, the independent Claim 8 is allowable over the teachings of Webb. Accordingly, the dependent Claims 9-15 are all also allowable as being dependent on an allowable base claim.

The independent Claim 19 is directed to a computer readable medium comprising a meta data header added to *received packets* by a media storage device as the packets are recorded on storage media within the media storage device, each of the received packets including an existing header to which the meta data header is added such that the *received packets* include both an existing header and a meta data header. The meta data header of Claim 19 comprises a cycle mark value including a pattern used to locate cycle boundaries within the received packets and a cycle count value specifying a cycle number of a cycle in which the received packets are received. As described above, Webb does not teach that a meta data header is added to a *received packet*. Webb teaches that the meta file and the data file are *stored separately* at the server. [Webb, col. 7, lines 9-14] Webb also does not teach adding a meta data header to the received packet of data *at the media storage device*. As described above, Webb teaches that the file stream flowing *from the computer system* to the backup system *contains metadata* at the boundaries of each file. [Webb, Abstract] As described above, Webb also does not teach that a

meta data header includes a cycle mark value which includes a pattern used to locate cycle boundaries and a cycle count value specifying a cycle number of a cycle in which the received packet of data was received. For at least these reasons, the independent Claim 19 is allowable over the teachings of Webb.

Claims 20-23 are all dependent on the independent Claim 19. As discussed above, the independent Claim 19 is allowable over the teachings of Webb. Accordingly, the dependent Claims 20-23 are all also allowable as being dependent on an allowable base claim.

The independent Claim 24 is directed to a media storage device. The media storage device of Claim 24 comprises means for interfacing configured for receiving a stream of data, thereby forming a received stream of data, and also for transmitting a retrieved stream of data, the received stream of data including packet header data, means for storing data for storing and retrieving the received stream of data, and means for processing coupled to the means for interfacing and to the means for storing for adding meta header data to the *received stream of data* as the received stream of data is received at the media storage device, such that each packet within the received stream of data includes both packet header data and meta header data, and providing the meta header data and the received stream of data to the means for storing for recording thereby forming a recorded stream of data, the meta header data including a cycle mark value marking cycle boundaries within the recorded stream of data. As described above, Webb does not teach that a meta data header is added to a *received packet*. Webb teaches that the meta file and the data file are *stored separately* at the server. [Webb, col. 7, lines 9-14] Webb also does not teach adding a meta data header to the *received packet* of data *at the media storage device*. As described above, Webb teaches that the file stream flowing *from the computer system* to the backup system *contains metadata* at the boundaries of each file. [Webb, Abstract] As also described above, Webb does not teach header data that includes a cycle mark value. For at least these reasons, the independent Claim 24 is allowable over the teachings of Webb.

The dependent Claim 25 further specifies that the means for processing is an embedded stream processor which also locates a first cycle mark value within the recorded stream of data during a playback operation, reads packets within the recorded stream of data after the first cycle mark value, strips the header data from read packets within the recorded stream of data thereby forming retrieved packets of data and transmits the retrieved packets of data through the means for interfacing to a receiving device. As described above, Webb does not teach header data that includes a cycle mark value. For at least these reasons, Claim 25 is allowable over the teachings of Webb.

Claims 25-29 are all dependent on the independent Claim 24. As discussed above, the independent Claim 24 is allowable over the teachings of Webb. Accordingly, the dependent Claims 25-29 are all also allowable as being dependent on an allowable base claim.

The independent Claim 30 is directed to a media storage device. The media storage device of Claim 30 comprises an interface circuit configured to receive a stream of data, thereby forming a received stream of data, and also to transmit a retrieved stream of data, the received stream of data including packet header data, storage media configured to store and retrieve the received stream of data, and an embedded stream processor coupled to the interface circuit and to the storage media to add meta header data to the *received stream of data* as it is received at the media storage device, such that each packet within the received stream of data includes both packet header data and meta header data, and provide the meta header data and the received stream of data to the storage media for recording to form a recorded stream of data, the meta header data including a cycle mark value marking cycle boundaries within the recorded stream of data. As described above, Webb does not teach that a meta data header is added to a *received packet*. Webb teaches that the meta file and the data file are stored separately at the server. [Webb, col. 7, lines 9-14] Webb also does not teach adding a meta data header to the *received packet* of data *at the media storage device*. As described above, Webb teaches that the file stream flowing *from the computer system* to the backup system *contains metadata* at the boundaries of each file. [Webb, Abstract] For at least these reasons, the independent Claim 30 is allowable over the teachings of Webb.

Claims 31-35 are all dependent on the independent Claim 30. As discussed above, the independent Claim 30 is allowable over the teachings of Webb. Accordingly, the dependent Claims 31-35 are all also allowable as being dependent on an allowable base claim.

The independent Claim 44 is directed to a method of writing data to a media storage device. The method of Claim 44 comprises receiving a received packet of data to be written to the media storage device, the received packet of data including a packet header, adding a meta header to the *received packet* of data at the media storage device thereby forming an extended packet of data which includes both the packet header and the meta header, wherein the received packet of data is an isochronous packet of data received over an isochronous channel, and storing the extended packet of data onto a media within the media storage device. As described above, Webb does not teach that a meta data header is added to a *received packet*. Webb teaches that the meta file and the data file are *stored separately* at the server. [Webb, col. 7, lines 9-14] Webb also does not teach adding a meta data header to the *received packet* of data *at the media storage*

device. As described above, Webb teaches that the file stream flowing *from the computer system* to the backup system *contains metadata* at the boundaries of each file. [Webb, Abstract] For at least these reasons, the independent Claim 44 is allowable over the teachings of Webb.

The dependent Claim 45 further specifies that the header includes a cycle mark value which includes a pattern used to locate cycle boundaries, and a cycle count value specifying a cycle number of a cycle in which the received packet of data was received. As described above, Webb also does not teach that a header includes a cycle mark value which includes a pattern used to locate cycle boundaries and a cycle count value specifying a cycle number of a cycle in which the received packet of data was received. For at least these reasons, Claim 45 is allowable over the teachings of Webb.

Claims 45-49 are all dependent on the independent Claim 44. As discussed above, the independent Claim 44 is allowable over the teachings of Webb. Accordingly, the dependent Claims 45-49 are all also allowable as being dependent on an allowable base claim.

The independent Claim 50 is directed to a method of writing data to a media storage device. The method of Claim 50 comprises receiving a received packet of data to be written to the media storage device, the received packet of data including a packet header and a common isochronous packet header, adding a meta data header to the *received packet* of data at the media storage device thereby forming an extended packet of data which includes the packet header, the common isochronous packet header and the meta data header and storing the extended packet of data onto a media within the media storage device. As described above, Webb does not teach that a meta data header is added to a *received packet*. Webb teaches that the meta file and the data file are *stored separately* at the server. [Webb, col. 7, lines 9-14] Webb also does not teach adding a meta data header to the *received packet* of data *at the media storage device*. As described above, Webb teaches that the file stream flowing *from the computer system* to the backup system *contains metadata* at the boundaries of each file. [Webb, Abstract] For at least these reasons, the independent Claim 50 is allowable over the teachings of Webb.

The independent Claim 51 is directed to a media storage device. The media storage device of Claim 51 comprises an interface circuit configured to receive a stream of data, thereby forming a received stream of data, and also to transmit a retrieved stream of data, storage media configured to store and retrieve the received stream of data, wherein the received stream of data includes one or more received packets of data, each including both a packet header and a common isochronous packet header, and an embedded stream processor coupled to the interface circuit and to the storage media to add a meta data header to each *received packet* in the received

stream of data as it is received at the media storage device, thereby forming an extended packet of data, and provide the extended packet of data to the storage media for recording to form a recorded stream of data, the meta data header including a cycle mark value marking cycle boundaries within the recorded stream of data. As described above, Webb does not teach that a meta data header is added to a *received packet*. Webb teaches that the meta file and the data file are *stored separately* at the server. [Webb, col. 7, lines 9-14] Webb also does not teach adding a meta data header to the *received packet* of data *at the media storage device*. As described above, Webb teaches that the file stream flowing *from the computer system* to the backup system *contains metadata* at the boundaries of each file. [Webb, Abstract] As also described above, Webb does not teach a meta data header including a cycle mark value. For at least these reasons, the independent Claim 51 is allowable over the teachings of Webb.

The independent Claim 52 is directed to a method of writing data to a media storage device. The method of Claim 52 comprises receiving a received packet of data to be written to the media storage device, the received packet of data including a packet header, wherein the media storage device maintains the packet header with the received packet of data, adding a meta data header to the *received packet* of data at the media storage device thereby forming an extended packet of data including both the packet header and the meta data header; and storing the extended packet of data onto a media within the media storage device. As described above, Webb does not teach that a meta data header is added to a *received packet*. Webb teaches that the meta file and the data file are *stored separately* at the server. [Webb, col. 7, lines 9-14] Webb also does not teach adding a meta data header to the *received packet* of data *at the media storage device*. As described above, Webb teaches that the file stream flowing *from the computer system* to the backup system *contains metadata* at the boundaries of each file. [Webb, Abstract] For at least these reasons, the independent Claim 52 is allowable over the teachings of Webb.

The independent Claim 53 is directed to a computer readable medium comprising a meta data header added to *received packets* by a media storage device as the packets are recorded on storage media within the media storage device, each of the received packets including an existing header, wherein the media storage device maintains the existing header with the received packets. It is specified in Claim 53 that the meta data header comprises a cycle mark value including a pattern used to locate cycle boundaries within the received packets; and a cycle count value specifying a cycle number of a cycle in which the received packets are received. As described above, Webb does not teach that a meta data header is added to a *received packet*. Webb teaches that the meta file and the data file are *stored separately* at the server. [Webb, col.

7, lines 9-14] Webb also does not teach adding a meta data header to the *received packet* of data *at the media storage device*. As described above, Webb teaches that the file stream flowing *from the computer system* to the backup system *contains metadata* at the boundaries of each file. [Webb, Abstract] As described above, Webb also does not teach that a meta data header includes a cycle mark value which includes a pattern used to locate cycle boundaries and a cycle count value specifying a cycle number of a cycle in which the received packet of data was received. For at least these reasons, the independent Claim 53 is allowable over the teachings of Webb.

The independent Claim 54 is directed to a media storage device comprises an interface circuit configured to receive a stream of data, thereby forming a received stream of data, and also to transmit a retrieved stream of data, the received stream of data including packet header data, storage media configured to store and retrieve the received stream of data; and an embedded stream processor coupled to the interface circuit and to the storage media to add meta header data to the *received stream of data* as it is received at the media storage device and provide the meta header data and the received stream of data, including the packet header data, to the storage media for recording to form a recorded stream of data, the meta header data including a cycle mark value marking cycle boundaries within the recorded stream of data. As described above, Webb does not teach that a meta data header is added to a *received packet*. Webb teaches that the meta file and the data file are *stored separately* at the server. [Webb, col. 7, lines 9-14] Webb also does not teach adding a meta data header to the *received packet* of data *at the media storage device*. As described above, Webb teaches that the file stream flowing *from the computer system* to the backup system *contains metadata* at the boundaries of each file. [Webb, Abstract] As also described above, Webb does not teach a meta data header that includes a cycle mark value. For at least these reasons, the independent Claim 54 is allowable over the teachings of Webb.

IV. CONCLUSION

Each of the claims pending within this appeal include limitations specifying either that a meta data header is added to a received packet including a packet header or that a meta data header is stripped from a packet and then the packet of data is transmitted to another device. There is nothing in the teachings of Webb that supports the rejections of claims with such limitations. Webb does not teach that a meta data header is added to a received packet. Webb also does not teach that a meta data header is added to a received packet at a media storage device. Further, Webb does not teach that a meta data header is stripped from a packet that is to

be transmitted. Accordingly, it is respectfully submitted that Claims 1-15, 19-35 and 44-54 are allowable over the teachings of Webb. Therefore, a favorable indication is respectfully requested.

Respectfully submitted,
HAVERSTOCK & OWENS LLP

Dated: December 18, 2007

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